

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

x

UNITED STATES OF AMERICA,

Plaintiff,

-v-

Case No. 14-CR-476 (ILG)

MOTION

GREGG MULHOLLAND,

Defendant.

X

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law and exhibits thereto, defendant GREGG MULHOLAND, by his attorneys, JAMES KOUSOUROS and EDWARD SAPONE, hereby moves this Court before the Honorable I. Leo Glasser, District Court Judge for the Eastern District of New York, at a time and date convenient for the Court, for Orders:

1. Allowing him to join in co-defendant Robert Bandfield's pretrial motions;
2. Suppressing the fruits of the wiretaps authorized on March 17, 2014 and April 23, 2014, or in the alternative for a hearing to determine the propriety of the wiretaps;
3. Suppressing the fruits of the searches conducted in Belize at the request of the United States government, or in the alternative, directing the government to produce a copy of its request for investigative assistance made to Belize under the Mutual Legal Assistance Treaty;
4. Directing the government to detail the procedures it took to safeguard the defendant's attorney-client privilege;
5. Directing the government to provide a Bill of Particulars;
6. Directing the government to redact surplusage from the indictment;
7. Compelling the government to reveal any evidence it intends to introduce at trial pursuant

to Rule 404(b) of the Federal Rules of Evidence sixty days prior to the commencement of trial;

8. Directing the pre-trial disclosure of all exculpatory and impeachment material;
9. Directing the disclosure of interviewed individuals and any recorded notes of said interviews;
10. Directing the government to provide notice of any expert testimony they may seek to elicit at trial;
11. Compelling the government to provide a witness list prior to trial; and
12. Permitting the defendant to file additional motions which may arise from the requests made herein; and to provide any such further relief as to the Court may seem proper and in the interest of justice.

Dated: New York, NY
December 7, 2015

_____/s/_____
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